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Attorney for:

CHARLES BARRETT

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT of CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 1:22-cr-00213-ADA-BAM
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE MOTIONS DUE DATE
vs.)	
)	
CHARLES BARRETT,)	
)	
Defendant)	

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, HONORABLE
BARBARA A. MCAULIFFE AND MICHEAL TIERNEY, ARIN HEINZ, JESSICA MASSEY,
ASSISTANT UNITED STATES ATTORNEY:

COMES NOW Defendant, CHARLES BARRETT, by and through his attorney of
record, Timothy Hennessy and David Torres, hereby requesting that the motions in limine due
date set for Friday, March 17, 2023, be reset to Wednesday, March 22, 2023.

Defense Counsel needs more time to write and finalize motions. Mr. Torres has been in a
multi-defendant homicide trial in the matter of *People vs. Ronald Pierce, et al.*, BF179192A in

front of the Honorable Kenneth Twisselman since January 18, 2023. Trial concluded today, March 15, 2023. Mr. Hennessy has also been engaged in a multi-defendant homicide trial, *People v. West, et al., BF188340A*. I have spoken to AUSA Michael Tierney, and he has no objection to resetting the motions date. All other due dates and hearing dates are to stay as ordered by the court.

The parties also agree the delays resulting from the continuance shall be excluded in the interest of justice pursuant to 18 USC 3161 (h)(7)(A) and 3161 (h)(7)(B)(1).

IT IS SO STIPULATED.

Respectfully Submitted,

DATED:3/15/2023

/s/ **Timothy Hennessy**

TIMOTHY HENNESSY
Attorney for Defendant
CHARLES BARRETT

DATED:3/15/2023

/s/ **David A. Torres**

DAVID A. TORRES
Attorney for Defendant
CHARLES BARRETT

DATED:3/15/2023

/s/ **Michael Tierney**

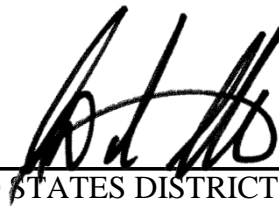
MICHAEL TIERNEY
Assistant U.S. Attorney

ORDER

IT IS SO ORDERED that the motions in limine due date of Friday, March 17, 2023, be reset to Wednesday, March 22, 2023.

IT IS SO ORDERED.

Dated: March 16, 2023


UNITED STATES DISTRICT JUDGE